

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**
Case No.: 3:24-cv-00277-KDB-DCK

DENNIS HANSCOM, on behalf of
himself and all others similarly
situated,

Plaintiffs,
v.
**MOTION FOR EXTENSION
OF TIME TO RESPOND TO
MOTION TO DISMISS**

**NORDSEC LTD., NORDSEC B.V.,
NORDVPN S.A., NORD
SECURITY INC., and TEFINCOM
S.A. d/b/a NORDVPN,**

Defendants.

Dennis Hanscom individually and on behalf all others similarly situated (“Plaintiff”), pursuant to Local Rule 7.1 and Rules 6 and 16 of the Federal Rules of Civil Procedure respectfully move the Court for an Order extending the time for Plaintiff to file a response to Defendants’ Motion to Dismiss [DE 44], and a commensurate extension to Defendants’ reply deadline, and in support hereof, Plaintiff respectfully shows:

1. Plaintiff commenced this action against Defendants on March 5, 2024.
2. Defendants were granted two extensions of time [DE 16 and 30] up to and including July 3, 2024 to file an Answer, or otherwise respond to Plaintiff’s Complaint.

3. On July 3, 2024 Defendants filed a Motion to Dismiss. [DE 44].
4. Plaintiff's response is due on July 17, 2024.
5. The time for performance has not yet expired.
6. Pursuant to Rule 15 (a)(1)(B), Plaintiff has 21 days (July 24, 2024) to Amend his Complaint and the time for performance has not expired.

7. Plaintiff has obligations in two other large cases which recently became known and require immediate attention.

8. Plaintiff respectfully requests an Order extending the time for Plaintiff to amend his Complaint, up through and including July 31, 2024, This includes one week of additional time to attend to other cases.

9. Plaintiff requests a commensurate extension of time be granted to Defendants to respond to Plaintiff's Amended Complaint making Defendants response would then be due August 21, 2024.

10. Counsel for Defendants consent to this requested extension.

11. This is Plaintiff's first request for an extension of time to respond to Defendants' Motion to Dismiss.

12. Plaintiff's Motion is not interposed for the improper purpose of undue delay.

WHEREFORE, Plaintiff respectfully requests the Court grant Plaintiff's Motion for Extension of Time to Respond to Defendants' Motion to Dismiss.

Date: July 16, 2024

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